

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

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In re:	:	Chapter 11
	:	
EASTERN LIVESTOCK CO., LLC, et al., <sup>1</sup>	:	Case No.: 10-93904-BHL-11
	:	
Debtor.	:	

**EXHIBITS A & B TO MOTION OF FIFTH THIRD BANK, N.A. TO LIMIT  
DISCOVERY OR, ALTERNATIVELY, FOR A PROTECTIVE ORDER (DKT NO. 1005)**

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<sup>1</sup> The Debtor entities are Eastern Livestock Co., LLC and Okie Farms, L.L.C.

HOOVER HULL LLP

January 10, 2012

SEAN T. WHITE

swhite@hooverhull.com

317.822.4400 x 109

VIA E-MAIL

Kent Britt  
Vorys, Sater, Seymour and Pease LLP  
221 E. Fourth St.  
Suite 2000, Atrium Two  
Cincinnati, OH 45202

Re: In re: Eastern Livestock Co., LLC  
United States Bankruptcy Court; Southern District of Indiana  
Case No. 10-93904-BHL

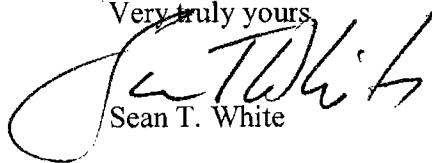
Dear Kent:

I write to request dates that the following Fifth Third Bank employees are available to be deposed in connection with the above referenced matter:

1. Anne Kelly, Relationship Manager for Eastern Livestock;
2. Dave Fuller, Vice President, Structured Finance Group Team Lead, initial relationship manager for Eastern Livestock;
3. Lori Hart, Operations Manager, Structured Finance Group;
4. Timothy Spurlock, Investigator in the Bank Protection Department;
5. Sean Kelly, Field Exam Department;
6. Devon Morse, Investigator;
7. Sara Chapman;
8. Amber Whitehouse;
9. Shannon Hughes;
10. Patty Voss; and
11. Darren Steinmann.

We would like to take the depositions January 31-February 3. In the event these individuals are not available, our alternative would be February 14-17. If you have any questions regarding this matter that you wish to discuss, please do not hesitate to call.

Very truly yours,



Sean T. White

STW/vkw  
611077\_1.DOCX/8728-1

EXHIBIT

A

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**From:** Britt, Kent A.  
**Sent:** Monday, January 30, 2012 4:16 PM  
**To:** Sean T. White  
**Cc:** Richardson, Eric W.; Morgenstern, Daniel C.  
**Subject:** Eastern Livestock

Sean,

When we spoke last week, Eric Richardson and I asked you if you would be willing to notice the requested depositions in each of the adversary proceedings. You indicated, however, that you were inclined to notice the depositions *only* for the main bankruptcy case. Our hope is to avoid a situation where creditors can conduct multiple depositions of each of Fifth Third's employees, and such a limited notice would not accomplish that goal. Please let us know if your position has changed so that we can proceed with scheduling the depositions, or if you plan to proceed with the narrow deposition notices.

Kent

**VORYS**  
Legal Counsel

**Kent A. Britt**

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